

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AARON ABADI,

Plaintiff,

-against-

AMERICAN AIRLINES GROUP, INC., et al.,

Defendants.

Civil Action No. 1:23-CV-04033-UA

**MOTION FOR ADMISSION
PRO HAC VICE**

Pursuant to Rule 3.1(c) of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Brittany C. Wakim, counsel for Defendant MedAire, Inc. (“MedAire”), of the law firm Victor Rane, respectfully moves this Court for an Order for admission to practice *Pro Hac Vice* for the purpose of appearing as counsel on behalf of MedAire in the above-captioned action.

I am currently a member in good standing of the bars of the Commonwealth of Pennsylvania and the State of New Jersey, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the required affidavit and proposed order pursuant to Local Rule 1.3.

Dated: Philadelphia, Pennsylvania
December 7, 2023

Respectfully Submitted,

By: Brittany C. Wakim
Brittany C. Wakim

Victor Rane
1650 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: (267) 297-3356
Email: bwakim@victorrane.com
Attorneys for Defendant
MedAire, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
AARON ABADI,	:
	:
Plaintiff,	:
	:
-against-	:
	:
AMERICAN AIRLINES GROUP, INC., et al.,	:
	:
Defendants.	:
-----X	

Civil Action No. 1:23-CV-04033-UA

**(PROPOSED) ORDER
GRANTING BRITTANY C. WAKIM,
ESQ. ADMISSION *PRO HAC VICE***

The Motion of Brittany C. Wakim, Esquire, for admission *Pro Hac Vice* in the above-captioned action is GRANTED.

Applicant has declared that she is a member in good standing of the bars of the Supreme Courts of Pennsylvania and New Jersey and her contact information is as follows:

Brittany C. Wakim
Victor Rane
1650 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: (267) 297-3356
Fax: (267) 297-3484
Email: bwakim@victorrane.com

Applicant, having requested admission *Pro Hac Vice* to appear for all purposes as counsel for MedAire, Inc., in the above-entitled action;

IT IS HEREBY ORDERED that Applicant is admitted *Pro Hac Vice* in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: _____

Judge Lewis J. Liman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AARON ABADI,

Plaintiff,

-against-

AMERICAN AIRLINES GROUP, INC., et al.,

Defendants.

Civil Action No. 1:23-CV-04033-UA

**AFFIDAVIT OF BRITTANY C. WAKIM,
ESQ. IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

COMMONWEALTH OF PENNSYLVANIA)
) s.s.:
COUNTY OF PHILADELPHIA)

BRITTANY C. WAKIM, being duly sworn, deposes and says:

1. I am special counsel with the law firm Victor Rane, attorneys for Defendant MedAire, Inc. (“MedAire”) in the above-captioned action.
2. I submit this affidavit in support of my motion for admission to practice *Pro Hac Vice* in the above-captioned action as counsel for MedAire.
3. I am licensed to practice law in the Commonwealth of Pennsylvania and have been a member in good standing of the Pennsylvania Bar since November 3, 2014 (a true and correct copy of a Certificate of Good Standing issued on November 8, 2023, by the Supreme Court of Pennsylvania is annexed hereto as Exhibit A.).
4. I am also licensed to practice law in the State of New Jersey and have been a member in good standing of the New Jersey Bar since October 31, 2014 (a true and correct copy of a Certificate of Good Standing issued on December 7, 2023, by the Supreme Court of New Jersey is annexed hereto as Exhibit B.).

5. Further, I am a member in good standing of the bars of the United States District Courts for the Eastern, Middle, and Western Districts of Pennsylvania, the District of New Jersey, the District of Colorado, the Eastern District of Arkansas, and the United States Court of Appeals for the Third Circuit.

6. I have never been convicted of a felony.

7. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

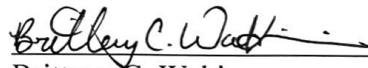
8. There are no disciplinary proceedings pending against me, nor have I ever been subject to any disciplinary proceedings.

9. I have never been subject to any suspension or disbarment proceedings.

10. I respectfully submit a proposed order granting my admission *Pro Hac Vice*, which is filed herewith.

WHEREFORE, your affiant respectfully requests that she be permitted to appear as counsel and advocate *Pro Hac Vice* to represent MedAire in the above-captioned action.

Dated: December 7, 2023


Brittany C. Wakim

Subscribed and sworn to before me
This 7 day of December, 2023


Notary Public

Commonwealth of Pennsylvania
Jahzara Lambert - Notary Public
Delaware County
My Commission Expires Nov 22, 2025
Commission Number 1411166

EXHIBIT “A”



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Brittany Clair Wakim, Esq.

DATE OF ADMISSION

November 3, 2014

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: November 8, 2023

Elizabeth E. Zisk

Elizabeth E. Zisk
Chief Clerk

EXHIBIT “B”

Supreme Court of New Jersey



Certificate of Good Standing

This is to certify that
(No. **117582014**) *was constituted and appointed an Attorney at Law of New*
Jersey on **October 31, 2014** *and, as such,*
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

Brittany Clair Wakim

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

*In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
7th day of December, 2023.*



Heather J. Sale
Clerk of the Supreme Court



Los Angeles
San Francisco
New York
Washington D.C.
Philadelphia
Pittsburgh
New Jersey

Brittany C. Wakim

O +267.297.3332
D +267.297.3356
F +267.297.3484
bwakim@victorrane.com

December 11, 2023

VIA ECF

United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Aaron Abadi v. American Airlines Group, Inc., et al.
Civil Action No. 1:23-cv-04033-LJL

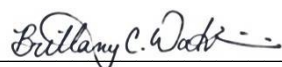
Dear Sir/Madam:

We tried to file my *Pro Hac Vice* Motion on December 7, 2023 in the above-referenced matter for *pro hac vice* admission on behalf of Defendant, MedAire, Inc. After filing, we received the attached payment confirmation with tracking ID ANYSDC-28664021 but do not believe the filing went through. We have checked the docket and do not see anything, and we did not receive any PACER confirmation of filing.

On December 11, 2023, we contacted the PACER helpdesk and the representative suggested that we write a letter and attach a copy of the *Pro Hac Vice* Motion that we filed and a copy of the payment confirmation, both of which are attached to this letter. We believe that this situation falls under ECF Rule 23.6 of a technical failure that prevented us from filing electronically in a timely fashion as the Certificate of Good Standing from the Commonwealth of Pennsylvania is now over 30 days old (it was within the 30-day timeframe at the time of filing). This presumed interruption in service prevented us from filing this *Pro Hac Vice* Motion in a timely fashion.

Please let us know if you require any further information or action from us in order to get this *Pro Hac Vice* Motion before the Court.

Very truly yours,



Brittany C. Wakim

Enclosures

From: [Brittany Wakim](#)
To: [Rosie Herrera](#)
Subject: FW: [External] Pay.gov Payment Confirmation: NEW YORK SOUTHERN DISTRICT COURT
Date: Thursday, December 7, 2023 12:53:17 PM

Rosie - see below. Please forward to the necessary people at the billing department so they know who and what this charge was for, etc.

Brittany

Brittany C. Wakim | Senior Counsel
VICTOR RANE
1650 Market Street | Suite 3600
Philadelphia | PA | 19103
D: 267.297.3356 | F: 267.297.3484 | M: 610.291.4001
www.victorrane.com

NOTICE: This message is intended only for use by the named addressee and may contain privileged and/or confidential information. If you are not the named addressee you should not disseminate, copy or take any action in reliance on it. If you have received this message in error please notify bwakim@victorrane.com and delete this message and any attachments accompanying it immediately. Thank you.

-----Original Message-----

From: do_not_reply@psc.uscourts.gov <do_not_reply@psc.uscourts.gov>
Sent: Thursday, December 7, 2023 12:52 PM
To: Brittany Wakim <bwakim@victorrane.com>
Subject: [External] Pay.gov Payment Confirmation: NEW YORK SOUTHERN DISTRICT COURT

Your payment has been successfully processed and the details are below. If you have any questions or you wish to cancel this payment, please contact: Helpdesk at 212-805-0800.

Account Number: 5468278
Court: NEW YORK SOUTHERN DISTRICT COURT
Amount: \$200.00
Tracking Id: ANYSDC-28664021
Approval Code: 026014
Card Number: *****6388
Date/Time: 12/07/2023 12:52:04 ET

NOTE: This is an automated message. Please do not reply